

EXHIBIT I

DECLARATION OF GEORGE CLINTON

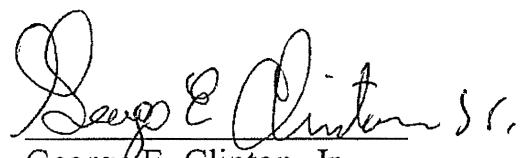
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury as follows:

1. I am an adult resident of the state of Florida and make this declaration with first-hand knowledge.
2. I am the founding member of all of the bands producing the sound recordings at issue in the above captioned litigation.
3. I founded The Parliaments in 1956 and several bands in ensuing years, beginning with Funkadelic in 1968 and followed by several others, including all female bands Parlette and Brides of Funkenstein. These bands and several others I conceived of and founded have released hundreds of songs and dozens of albums.
4. I have employed hundreds of artists in my bands. Many of them are legendary musicians. When the band Funkadelic was inducted into the Rock and Roll Hall of Fame, the Hall of Fame required me to limit the number of musicians that attended and accepted the induction with me to only 15, although I could have easily brought dozens more worthy of the honor.
5. It was also my role to manage the various employee issues that arose from the band's employment of these issues. I did have professional help in this regard but most of the important employee management and compensation issues were mine to resolve. I do recall that, on at least two occasions between 1972-1974, we sent letters to all musicians clarifying that they were employees on salary and, in the case of a few like Bernie Worrell, they were to receive the use of automobiles as part of their compensation.
6. Since I did not have title to any of the sound recordings until years later, I could not and did not promise or provide any member of the band with ownership interests in them.
7. Bernie Worrell and a handful of the hundreds of artists with whom we worked did receive publishing royalties as a means of receiving additional compensation and acknowledging their contributions. To my knowledge, he has continuously received those royalties as I have not. Mr. Worrell also

regularly received double and triple union scale for his work, a benefit no other band member regularly received.

8. As the founder of the band it was my responsibility to exercise final creative control over all of the acts that I founded. While I did not have formal musical training, that hardly set me apart from many other great artists of the several eras in which I made hit records for my bands as well as several others such as the Red Hot Chilli Peppers and many other who hired me to collaborate on their hit records as a performer, producer and arranger.
9. As it relates to the recordings that are at issue in this case, I decided which of those songs were made, what parts were included in final versions, which ones were included on albums and in which order. I was responsible for their marketing and commercial success. I invested my financial resources and leveraged my music industry contacts in those marketing and commercial endeavors.
- 10.I founded several recording and production companies that I financed and managed with no input or support from Mr. Worrell on the operations and administration of those companies, contracts they made and not made, payments that were made and otherwise.
- 11.I had ultimate authority for managing the business of my bands. I negotiated the record deals. I decided which bills got paid. I negotiated salaries. If business deals did not work out, as was commonly the case in the music industry, especially in the era when most of our music was made, the financial responsibility and legal accountability fell on me and not the musicians.
- 12.In spite of my many efforts, like many others in my position, I do not currently have title to the sound recording copyrights for most of the works at issue in this case.
- 13.The few master recordings that I acquired many years after the creation of the works, I obtained through litigation that I financed by myself with no contribution from any of the musicians I have hired over the years, including and especially Mr. Worrell.

14. Mr. Worrell called me shortly before he died and asked me for financial assistance, including a share of royalties from the sampling of sound recordings (or other sound recording revenue) that I truthfully told him I was not receiving either.
15. While I could not and would not relinquish to him or anyone else the rights in the sound recordings at issue here or recognize his rights and told him so, my wife and I did offer advice and other assistance to him and to his wife about how he could protect his publishing copyrights through the copyright recapture process.



George E. Clinton, Jr.
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